PRIVACY POLICY

1. INTRODUCTION

1.1 When you are using our services, you trust us with your personal information. JFD Overseas Ltd (collectively as "JFD Overseas" or "the Company") has prepared the present privacy policy to help you to understand how we treat the personal information of individuals who are users of our website, **www.jfdoverseas.com.** The present privacy policy shall provide you information regarding the collection, use and disclosure of Personal Data we receive from the users of the Site.

1.2 When you create a Demo or Live account with the Company, you must make an initial registration through our website and the account opening form. At that point you are requested to agree with the terms listed in the given Privacy Policy. You confirm acceptance of these terms by ticking the box on the account opening form. If you do not choose to tick the box, then it is considered that you are not giving your consent and the Company cannot collect and process your data neither provide any additional services to you. By opening an account with the Company and/or other affiliate companies of the JFD group of companies (hereinafter "JFD Group") or by using any website of the Company and/or other website of the JFD Group, you give your consent to the use of your personal information and also collection of the information from the Company and JFD Group as per explained in this policy privacy statement.

1.3 We are furthermore obligated to collect such personal data not only for the commencement and execution of a business relationship with you but also for the performance of our contractual, regulatory, statutory and legal obligations.

1.4 Kindly note that if you do not provide us with the required data, then we will not be allowed to commence or continue our business relationship either with you as an individual or as the authorized representative/agent or beneficial owner of a legal entity.

2. INFORMATION COLLECTION AND USE

2.1 The Company must receive or collect your information to create your account with us and set you as a client of the Company. Further we collect data to operate, provide, improve, understand, customise and support our services in relation to your account. We also have the right and the duty by virtue of its area of activity to check the accuracy of the client data contained in the databases by periodically asking you to update and/or correct or confirm the accuracy of the client data provided. We ask and collect from our clients, prior to using the JFD platform and/or services, the personal data information below:

a) Contact Data: When you sign up for a JFD Account, we require certain information such as your first name, last name, nationality, date of birth, telephone number (landline and mobile), fax number, email address and postal address.

b) Family and Professional Data: include information on your marital status, education, occupation, information regarding your financial situation such as source of wealth and gross annual income.

c) Tax Data: we collect information such as country of residency, tax identification number and citizenship

d) Financial data: To use the services of JFD we require you to provide certain information (like information about your bank account, name of your bank, IBAN number, SWIFT/BIC number) in order to facilitate the processing of payments.

e) Any other data needed from the Company to perform its due diligence obligations and any other statutory, regulatory, legal obligations.

2.2 We may also collect and process personal data which we lawfully obtain not only from you but also from other entities within the JFD Group or other third parties, e.g. public authorities, companies that introduce you to us, companies that process card payments and publicly available sources which we lawfully obtain, and we are permitted to process.

2.3 By continuing to use the Company's website you confirm that you are of legal age, and expressly agree with

this Privacy Policy and consent to JFD Overseas' collecting, maintaining, using, and disclosing your personal data.

3. PRIVACY DISCLOSURE OF PERSONAL INFORMATION

3.1 Any personal information you provide us with will be treated with confidentiality and shared only within the Company, its affiliates and its business partners. In addition, it will not be disclosed to any third party except under any regulatory or legal proceedings as well as to third parties that solely provide statistical services to the Company to improve its marketing campaign.

3.2 As an example, the Company intends to use Google Analytics. Google Analytics Advertising Features allow you to enable features in Analytics that aren't available through standard implementations. Advertising features include:

- Remarketing with Google Analytics
- Google Analytics Demographics and Interest Reporting
- Integrated services that require Google Analytics to collect data via advertising cookies and anonymous identifiers.
- Google Display Network Impression Reporting

3.3 Website tracking systems may also collect data specifying the pages you have accessed, how you discovered this site, the frequency of visits and so on. The information we obtain is used to improve the content of our website and may be used by us to contact you personally, by any appropriate means, and to provide you with any information we believe may be of use to you.

3.4 Clients accept and consent that the Company may, from time to time, contractually engage companies for statistical purposes in order to improve the Firm's marketing; as a result, some or all of the clients' personal data may be disclosed on an anonymous and aggregated basis only.

4. COOKIES

4.1 This website uses cookies to better the users experience while visiting the website. As required by legislation, where applicable this website uses a cookie control system, allowing the user to give explicit permission or to deny the use of /saving of cookies on their computer/device.

4.2 Cookies are small text files saved to the user's computer hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

4.3 Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors or use the cookie control system if available upon their first visit.

4.4 JFD Overseas uses both session ID cookies and persistent cookies. A session ID cookie does expire when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. To remove persistent cookies, follow the directions provided in your Internet browser's 'help' file. JFD Overseas may also use independent external service providers to track the traffic usage on the website.

5. MONITORING AND RECORDING

5.1 JFD Overseas will as required by the Law, monitor and record any communication you have with us whether in writing, by phone or by electronic mail.

6. THIRD PARTY WEBSITE LINKS

6.1 Links may appear on the website that are not operated or monitored by JFD Overseas, known as “third-party websites”. Such third party websites are not bound by this privacy policy and we are not responsible for their content. You should be aware that the privacy policies of these sites may differ from our own. No warranties or liability related to the contents of such third-party websites are made. Using links to third-party websites are at your own sole risk and discretion.

7. ADVERTS AND SPONSORED LINKS

7.1 This website may contain sponsored links and adverts. These will typically be served through our advertising partners, to whom may have detailed privacy policies relating directly to the adverts they serve.

7.2 Clicking on any such adverts will send you to the advertiser’s website through a referral program which may use cookies and will track the number of referrals sent from this website. This may include the use of cookies which may in turn be saved on your computer’s hard drive. Users should therefore note they click on sponsored external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

8. SECURITY

8.1 We use appropriate technical, organisational and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorised access, disclosure, alteration and destruction. Unfortunately, no company or service can guarantee complete security. Unauthorised entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

8.2 Among other practices, your account is protected by a password for your privacy and security. You must prevent unauthorised access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

8.3 Transmission of information via regular email exchange is not always completely secure. The Company however exercises all possible actions to protect clients’ personal data, yet it cannot guarantee the security of client data that is transmitted via email; any transmission is at the clients’ own risk. Once the Company has received the client information it will use procedures and security features in an attempt to prevent unauthorised access.

8.4 When you email the Company (via the "Contact Us" page), or using the Live Chat feature, a person may be requested to provide some additional personal data, like their name or email address. Such data will be used to respond to their query and verify their identity. Emails are stored on our standard internal contact systems which are secure and cannot be accessed by unauthorised external parties.

9. SHARING INFORMATION WITH OUR AFFILIATES AND THIRD PARTIES

9.1 In the course of the performance of our contractual and statutory obligations, your personal data may be provided to various departments within the Company but also to other companies of the JFD Group. Various service providers and suppliers may also receive your personal data so that we may perform our obligations.

9.2 It must be noted that we may disclose data about you for any of the reasons set out hereinabove, or if we are legally required to do so, or if we are authorised under our contractual and statutory obligations or if you have given your consent.

9.3 Under the circumstances referred to above, recipients of personal data may be:

- Supervisory and other regulatory and public authorities, notary offices, tax authorities, criminal prosecution authorities as much as a statutory obligation exists
- Credit and financial institutions such as banks, payment systems and processors, institutions participating in the trade execution and execution venues (for example regulated markets, multilateral trading facilities, trade repositories and other local or foreign brokers)
- External legal consultants authorised by the Company
- Financial and business advisors authorised by the Company
- Auditors and accountants authorised by the Company
- Marketing and advertising agencies
- Fraud prevention agencies
- File storage companies, archiving and/or records management companies, cloud storage companies
- External authorised processors for processing client data
- Debt collectors subject to bankruptcy or insolvency claims
- Potential or actual purchasers and/or transferees and/or assignees and/or charges of any of the Company's benefits, rights, title or interest under any agreement between the customer and the Company, and their professional advisers, service providers, suppliers and financiers.
- Other companies of the JFD Group

10. OPT-OUT

10.1 If you no longer wish to receive any promotional communications, you may opt-out of receiving them by following the instructions included in each communication.

10.2 The Company reserves the right to contact you, albeit the fact that you have opted out, in cases where such contact as necessary deems to be necessary.

10.3 In case you wish to prevent your data from being used by Google Analytics, please follow this link to opt out: https://support.google.com/analytics/answer/181881?hl=en

11. ACCESS TO PERSONALLY IDENTIFIABLE INFORMATION

11.1 If your personally identifiable information changes, you must inform the Company accordingly; please e-mail us at: support@jfdbrokers.com.

12. CHANGES TO THIS PRIVACY POLICY

12.1 This Privacy Policy may be altered at any time, upon the discretion of the Company. We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy. If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.